

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

PEOPLEFLO MANUFACTURING, INC.

Plaintiff,

v.

**SUNDYNE, LLC; ACCUDYNE INDUSTRIES
LLC; DXP ENTERPRISES INC.; and
PUMPWORKS, LLC**

Defendants,

PUMPWORKS, LLC

Counter-Plaintiff,

v.

PEOPLEFLO MANUFACTURING, INC.

Counter-Defendant.

Case No. 1:20-CV-03642

Honorable Manish S. Shah

Magistrate Judge Young B. Kim

**NOTICE OF MOTION FOR LEAVE TO FILE EVIDENCE TO PROVE UP DAMAGES
FOLLOWING SUMMARY JUDGEMENT AS TO LIABILITY AND FOR AN ORDER
AWARDING ATTORNEYS' FEES**

Please take notice that on the 31st of July, 2025, at 9:45 a.m., or as soon thereafter as counsel may be heard, I shall appear before the Honorable Judge Manish S. Shah, or any judge sitting in his stead in Courtroom 1919 of the U.S. District Court of the Northern District of Illinois, Eastern Division, 219 South Dearborn Street, Chicago, IL 60604, and then and there present Counter-Plaintiff PumpWorks LLC's Motion for Leave to File Evidence to Prove Up Damages Following Summary Judgement as to Liability and for an Order Awarding Attorneys' Fees, a copy of which is enclosed herewith and hereby served upon you.

Date: July 28, 2025

Respectfully submitted,

**DXP ENTERPRISES, INC., and
PUMPWORKS, LLC**

By: /s/ Monica L. Thompson

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